ROBINSON, McFadden & Moore, P.C. 169091



Attorneys and Counselors at Law

DAVID W. ROBINSON, II JOHN S. TAYLOR, JR.

DANIEL T. BRAILSFORD FRANK R. ELLERBE, III

THOMAS W. BUNCH, II

J. KERSHAW SPONG

D. CLAY ROBINSON

R. WILLIAM METZGER, JR.**

KEVIN K. BELL

Annemarie B. Mathews †

BONNIE D. SHEALY

CHARLES H. McDonald

MARGARET R. SCOOPMIRE

Erin A. Cook

M. KEVIN GARRISON

L. JEFFERSON DAVIS, IV

** Certified Specialist in Bankruptcy and Debtor-Creditor Law

† Also Admitted in North Carolina

January 13, 2004

VIA HAND DELIVERY

Mr. Bruce Duke
Executive Deputy Director
Public Service Commission of South Carolina
Synergy Business Park, Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: SCCTA/USF 2003

Case No. 1997-0239-C Our File No. 19336-0011

Dear Mr. Duke:

Enclosed for filing please find South Carolina Cable Television Association's Interrogatories to BellSouth Telecommunications, Inc. and Certificate of Service. Please date-stamp the extra copies provided as proof of filing and return them with our courier.

If you have any questions, please have someone on your staff contact me.

Very truly yours,

ROBINSON, McFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

DAVID W. ROBINSON (1869-1935) DAVID W. ROBINSON, JR. (1899-1989) J. MEANS MCFADDEN

(1901-1990)

THOMAS T. MOORE RETIRED

JAMES M. BRAILSFORD, III
RETIRED

Founding Member

FRE/abw Enclosures

CC: Ms. Nancy Horne
Parties of record
Patrick Turner, Esquire



8,780, Am, fle, a

ACCEPTED

Legal 308 [-/Y-1]

BEFORE THE PUBLIC SERVICE COMMISISON OF SOUTH CAROLINA



DOCKET NO. 97-239-C

In Re:)	Interrogatories to BellSouth	
Proceeding to Establish Guidelines for an Intrastate Universal Service Fund	į	Telecommunications, Inc.	, o en
illiastate Offiversal Service Furiu)		1.7
)		
)		

TO: PATRICK W. TURNER, ESQUIRE, attorney for BellSouth Telecommunications, Inc.

Pursuant to the South Carolina Rules of Civil Procedure, 26 S.C. Reg. § 103-851, and other applicable rules of practice and procedure of the Public Service Commission of South Carolina, the South Carolina Cable Television Association requests that BellSouth Telecommunications, Inc. respond to the following written interrogatories within ten (10) days after service.

<u>Interrogatory No. 1</u>: For each service for which you have reduced a rate and received USF funding since inception of the South Carolina USF, state the following:

- a) the minutes of use of such service for each year since 1997; and,
- b) the revenues received from the sale of such service for each year since 1997.

ROBINSON, McFADDEN & MOORE, P.C.

S. C. PUBLIC SERVICE COMMISSION

E C E I V E

JAN 1 5 2004

E C E I V E

UTILITIES DEPARTMENT

By:

Frank R. Ellerbe, III Bonnie D. Shealy

Post Office Box 944

Columbia, South Carolina 29202

(803) 779-8900

Attorneys for South Carolina Cable Television Association

January **25**, 2004

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 1997-0239-C

In Re:)
Proceeding to Establish Guidelines for an Intrastate Universal Service Fund	CERTIFICATE OF SERVICE)))

This is to certify that I, Chris Jackson, a Courier with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **Interrogatories to BellSouth Telecommunications**, **Inc.** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Patrick W. Turner, Esquire BellSouth Telecommunications, Inc. 1600 Williams Street, Suite 5200 Columbia, SC 29202

Dated at Columbia, South Carolina this 13th day of January 04.

Chris Jackson

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 1997-0239-C

In Re:)
Proceeding to Establish Guidelines for an Intrastate Universal Service Fund)) CERTIFICATE OF SERVICE)
))

This is to certify that I, Angela B. Wedekind, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **Interrogatories to BellSouth Telecommuncations, Inc.** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Kay Berry Alltell South Carolina, Inc. 2000 Center Pointe Drive, Suite 2400 Columbia, SC 29210

Gene V. Coker, Esquire AT&T - Law & Government Affairs Suite 8100 1200 Peachtree Street, NE Atlanta, GA 30309

John C. Ruoff, Ph.D. 4322 Azalea Drive Columbia, SC 29205

Susan B. Berkowitz, Esquire SC Appleseed Legal Justice Center Post Office Box 7187 Columbia, SC 29202 Martin H. Bocock, Jr. Sprint, Director-External Affairs SC Sprint 1122 Lady Street, Suite 1050 Columbia, SC 29201

Stan J. Bugner, State Director Verizon Select Services, Inc., Suite 825 1301 Gervais Street Columbia, SC 29201

Craig K. Davis, Esquire 1420 Hagood Avenue Columbia, SC 29205-1327

Scott A. Elliott, Esquire Elliott & Elliott 721 Olive Street Columbia, SC 29205

Nanette Edwards ITC DelltaCom Communications 4092 S. Memorial Parkway Huntsville, AL 35802

Robert D. Coble, Esquire Nexsen Pruet Adams Kleemeier, LLC PO Drawer 2426 Columbia, SC 29202

Faye A. Flowers, Esquire Parker, Poe, Adams & Bernstein Post Office Box 1509 Columbia, SC 29202

Steven W. Hamm, Esquire Richardson, Plowden, Carpenter & Robinson, P.A., P.O. Drawer 7788 Columbia, SC 29202-7788

Elliott F. Elam, Jr., Esquire South Carolina Department of Consumer Affairs Post Office Box 5757 Columbia, SC 29250-5757 Robert E. Tyson, Jr., Esquire Sowell Gray Stepp & Laffitte, LLC Post Office Box 11449 Columbia, SC 29211

John M.S. Hoefer, Esquire Willoughby & Hoefer, P.A. Post Office Box 8416 Columbia, SC 29202

Darra W. Cothran, Esquire Woodward, Cothran & Herndon P.O. Box 12399 Columbia, SC 29211

John F. Beach, Esquire Ellis Lawhorne & Sims, P.A. P.O. Box 2285 Columbia, SC 29202

M. John Bowen, Jr., Esquire McNair Law Firm, P.A. P.O. Box 11390 Columbia, SC 29211

Patrick W. Turner, Esquire BellSouth Telecommunications, Inc. Post Office Box 752 Columbia, SC 29202

Dated at Columbia, South Carolina this 13th day of January 04.

Angela B. Wedekind